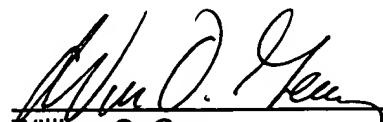


packetization of the data occurs along an axis substantially orthogonal to the array of transform coefficients. The Examiner cites column 3, lines 24-36, column 4, lines 39-50 and column 7, line 8 through column 8, line 54 of the Zeng reference for support allegedly showing this element of the claims. However, a careful consideration of these passages does not reveal any teaching or suggestion regarding the axis along which packetization of the video occurs. The Zeng reference is completely silent regarding this element of the claims at issue. Additionally, Zeng does not show at least two arrays arranged along an axis substantially orthogonal to the axis of packetization of the transform coefficients. The arrays that Zeng shows are sub-bands (Fig. 8). These sub-bands are arranged side-by-side along a horizontal axis which would not be orthogonal to the axis of packetization, which applicant teaches is along a horizontal slice. Referring to Fig. 10, coefficients within the sub-bands are flipped (scrambled) both within the sub-band itself vertically and horizontally with the adjacent sub-band. When flipping occurs vertically however, it occurs within a single array. However, the claims call for transposing at least one transform coefficient of at least two of the arrays. If coefficients are transposed only between the two sub-bands, the transposition occurs at a direction which is not orthogonal to the axis of packetization, *i.e.*, along a horizontal axis. This leads to the problem described in the "Background of the Invention" section at page 3, lines 8-23. Moreover, claims 2, 16 and 19 call for the transposed coefficients to occupy corresponding positions in the two arrays. The Examiner refers to Fig. 10 and the text at column 7, line 38 through column 8, line 43 but none of this text indicates this type of transposition. Zeng fails to show arrays arranged along an axis which is orthogonal to an axis of packetization and further fails to show transposition of coefficients between these arrays.

Accordingly, the rejection under § 102 should be withdrawn, and the case passed to issue.

Respectfully submitted,

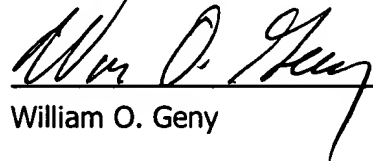


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CERTIFICATE OF MAILING

I hereby certify that this Response to Office Action is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Commissioner of Patents, P. O. Box 1450, Alexandria, Virginia 22313-1450 on July 28, 2004.

Dated: July 28, 2004



William O. Geny

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